



Miedel & Mysliwiec LLP

September 2, 2020

Hon. Laura Taylor Swain
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

**RE: United States v. Andrei Tyurin
15-Cr-333**

Dear Judge Swain:

Mr. Tyurin's sentencing is currently scheduled for September 25th. With the consent of the government, I respectfully request an adjournment of sentencing of at least one month. Since the onset of the COVID-19 crisis, I have been unable to effectively communicate with my client. Legal calls are sporadic, limited in time, and are not always confidential because a counselor sometimes remains in the room with the client. We have just been informed that MDC will start in person legal visits (on a limited basis) on September 10. I am therefore hopeful that I will be able to see Mr. Tyurin in the next few weeks.

Because I need my client's assistance in crafting a persuasive sentence memorandum, I ask that the sentencing be adjourned for about one month. I note, again, that this request is made with the consent of the government.

Thank you for your consideration.

The sentencing is adjourned to November 5, 2020, at 10:00 a.m. and the related deadlines are modified accordingly. The Court will seek to arrange an in-person appearance unless counsel informs Chambers by October 22, 2020, that Mr. Tyurin wishes to proceed remotely. The precise date, time and modality of the proceeding cannot be confirmed until late October; counsel are requested to keep their calendars clear for the entire morning of November 5, 2020, until further notice.

SO ORDERED.

9/4/2020

/s/ Laura Taylor Swain, USDJ

Sincerely,

/s/

Florian Miedel
Counsel for Andrei Tyurin